

Rule 26(f)(3)(B): The Parties anticipate conducting discovery regarding the duties performed by Plaintiffs; hours of work; compensation, wages, tips, gratuities, and other remuneration received; payroll deductions and reimbursements; Plaintiffs' claims; Plaintiffs' damages; and Defendants' defenses.

Rule 26(f)(3)(C): The Parties do not anticipate that there will be a great deal of ESI involved in this case. However, the Parties agree to follow the Federal Rules of Civil Procedure with respect to the discovery of ESI, and further agree to cooperate in the production of same in a mutually agreeable format.

Rule 26(f)(3)(D): The parties will submit a Joint Motion for Entry of an Agreed Protective Order for confidential non-public business information and financial records.

Rule 26(f)(3)(E): The Parties do not currently request any changes in the limitations on discovery imposed by the applicable rules. However, in the event this lawsuit is certified as a collective action, Defendants anticipate requesting leave of Court to take more than ten depositions.

Rule 26(f)(3)(F): The parties will submit a Joint Motion for Entry of an Agreed Protective Order for confidential non-public business information and financial records.

Respectfully submitted,

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